

February 26, 2016

Mr. John G. Radcliffe
Chairman
New Bedford Conservation Commission
New Bedford City Hall
133 William Street
New Bedford, MA 02744

RE: Nitsch Project #9972
Polymerine Site
New Plainville Road
New Bedford, MA

Dear Mr. Radcliffe:

This letter is in regards to the Site Improvements Project at the Former Polymerine Site in New Bedford, Massachusetts. Nitsch Engineering has reviewed the following items submitted as part of the proposed project:

- Plans entitled, "City of New Bedford, Former Polymerine Site, Site Improvements Project, 241 Duchaine Boulevard, New Bedford, Massachusetts," prepared by Tighe and Bond, dated December 2015;
- Report entitled, "Stormwater Report, Former Polymerine Site – 241 Duchaine Boulevard," prepared by Tighe and Bond, dated December 2015; and
- Report entitled, "Notice of Intent, Former Polymerine Site Improvements & PCB Cleanup Plan, 241 Duchaine Boulevard, New Bedford, Massachusetts," prepared by Tighe & Bond, dated February 2016.

Nitsch Engineering has reviewed the recently submitted information. We have the following comments:

1. The project includes the demolition of an existing building, site parking lots, and rail spur as well as the removal of underground hazardous materials. The existing site improvements will be replaced with a proposed parking lot.
2. The project is a redevelopment project, which means it is required to meet the Stormwater Management Guidelines to the maximum extent practicable. The Stormwater Management Checklist describes the project as a mix of new development and redevelopment. In our opinion, the project is clearly redevelopment.
3. The haybales and erosion control drawn on the demolition plan should be drawn consistent with the limits of demolition. Haybales or other erosion control measures should be included at the top of the drainage swale located in the Duchaine Boulevard right-of-way.
4. The project includes excavation within the wetlands. The plans do not quantify the amount of disturbance. However, the Notice of Intent (NOI) describes 1,880 square feet of wetlands disturbance. There is no remediation or restoration plan. The NOI simply describes restoring the disturbed wetlands with wetlands restoration mix. The Commission should consider requiring the applicant to provide a wetlands planting plan.

5. The NOI describes that the site will be used as a parking lot. Typically, parking lots are required to include water quality treatment to remove 80% of suspended solids generated by the vehicles entering the site and parking in the parking lot. The proposed project does not include any water quality treatment. Parking lots that generate 1,000 vehicle trips per day are considered land uses with higher potential pollutant loads (LUHPPLs) and require enhanced treatment. It is unlikely that this parking lot would generate 1,000 vehicle trips per day. Information should be provided on the capacity of the proposed lot. We recommend that water quality best management practices (BMPs) be included on the project consistent with the Guidelines. Details of the BMPs should also be included on the plans
6. The NOI describes the installation of a fence on the edge of the parking lot. The location of the fence and a fence detail should be provided.
7. In addition to the remediation work proposed in the wetlands, the proposed project includes the installation of the parking lot and associated grading within 25 feet of the wetlands.
8. The grading plan shows a 4-foot 3:1 slope along the southern property line. We recommend a swale be constructed on the property to insure that stormwater does not flow onto the adjacent property.
9. The Operations and Maintenance Plan does not include any information regarding water quality BMPs because they are not proposed. If the applicant adds water quality BMPs consistent with the Guidelines, they should be added to the Operations and Maintenance Plan.
10. We recommend that language be added to the Operations and Maintenance Plan prohibiting the storage of snow within the buffer zone.
11. The project will involve the disturbance of more than one acre. Therefore, a Stormwater Pollution Prevention Plan (SWPPP) will need to be prepared and filed with EPA prior to construction.

If you have any questions, please call us at 617-338-0063.

Very truly yours,

Nitsch Engineering, Inc.



Scott D. Turner, PE, AICP, LEED AP ND
Director of Planning

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